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October 4, 2007

VIA HAND DELIVERY AND E-FILING

Magistrate Judge Mary Pat Thyng  
U.S. District Court for the District of Delaware  
844 North King Street, Room 4209  
Lock Box 18  
Wilmington, Delaware 19801

**RE: Halotis Investments S.A., v. Arch Hill Capital N.V., Lithium Technology Corp., Hendrikus Harold Van Andel, C.A. No. 06-679**

Dear Magistrate Judge Thyng:

We write to inform Your Honor that the above-captioned matter has been settled in principle and that counsel for the parties are in the process of memorializing the settlement terms in writing.

We also write to request that Your Honor grant the enclosed stipulation and order. There is currently an October 5 deadline for Defendants to respond to the complaint and Plaintiff to move to substitute the estate of defendant Hendrikus Harold Van Andel. To provide the parties with additional time to finalize and to reduce to writing the settlement terms, the enclosed stipulation and order moves the current deadline to November 5, 2007.

We will continue to keep the Court apprised of the status of settlement. Of course, we are available at the Court's request to answer any questions Your Honor may have.

Respectfully submitted,

*/s/ Matthew F. Davis*

Matthew F. Davis (#4696)

cc: All Counsel of Record (via e-filing)

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

HALIOTIS INVESTMENTS S.A.	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 1:06-cv-00679-***
	)	
ARCH HILL N.V., LITHIUM TECHNOLOGY	)	
CORP., HENDRIKUS HAROLD van ANDEL	)	
	)	
Defendants.	)	

**STIPULATION AND ORDER**

WHEREAS, the parties to this action stipulated, and this Court ordered on September 5, 2007, that (i) Plaintiff shall have until October 5, 2007 to file a motion to substitute the proper party for the late Mr. van Andel and (ii) Defendants shall have until October 5, 2007 to respond to the complaint;

WHEREAS, this action has been settled in principle and counsel for the parties are in the process of memorializing the settlement terms in writing;

WHEREAS, the parties require additional time to memorialize the settlement terms in writing;

NOW, THEREFORE, Plaintiff and Defendants hereby stipulate and agree, subject to the approval of the Court, as follows:

1. If a final settlement agreement is not executed by the parties beforehand, Defendants shall have until November 5, 2007 to respond to the complaint filed in the above-captioned action; and

2. If a final settlement agreement is not executed by the parties beforehand, Plaintiff shall have until November 5, 2007 to file a motion to substitute the proper party for the late Mr. van Andel.

/s/ Matthew F. Davis

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*Attorneys for the late Hendrikus Harold  
van Andel, Lithium Technology Corp., and  
Arch Hill N.V.*

Dated: October 4, 2007

SO ORDERED this \_\_\_\_ day of October, 2007

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Magistrate Judge Mary Pat Thyng